

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS -

UNITED STATES OF AMERICA)
)
)
 v.)
)
RAQUEL FORERO,)
)
)
Defendant.)
)

03 CR 10380 PBS
CRIMINAL NO.:

VIOLATIONS:

**18 U.S.C. § 1001 - Making False
Statements to Federal Agency**

INDICTMENT

COUNT ONE: (Title 18, United States Code, Section 1001 - Making False Statements to
Federal Agency)

The Grand Jury charges:

On or about June 8, 2002, in the District of Massachusetts,

RAQUEL FORERO

the defendant herein, in a matter within the jurisdiction of the Executive Branch of the
Government of the United States, did knowingly and willfully make materially false written
statements and representations, to wit: in a typewritten letter to Michael Lahey, the Special Agent
in Charge of the Internal Revenue Service, Criminal Investigation, she stated "my 1999 tax return
delinquency is the only instance I have ever missed filing punctually, and that has since been paid
off." Defendant RAQUEL FORERO knew that these statements and representations were false a
at the time she made them.

All in violation of Title 18, United States Code, Section 1001.

COUNT TWO: (Title 18, United States Code, Section 1001 - Making False Statements to Federal Agency)

The Grand Jury further charges:

On or about July 9, 2002, in the District of Massachusetts,

RAQUEL FORERO

the defendant herein, in a matter within the jurisdiction of the Executive Branch of the Government of the United States, did knowingly and willfully make materially false statements and representations, to wit: during an Oral Reply hearing before Joseph Galasso, the Special Agent in Charge of the Internal Revenue Service, Criminal Investigation, concerning whether she should be terminated as an employee of the Internal Revenue Service for failure to file her Federal Tax Return for tax year 1999, she made false material representations.

During this hearing, defendant RAQUEL FORERO did knowingly state as follows:

TESTIMONY

[False Declarations are underlined]

9:4-6 Galasso: And just to clarify for me, so as of this date, you're paid up? You've filed your tax returns?"

9:7 FORERO: Yes. That's all fine.

9:8 Galasso: Okay.

9:9-16 FORERO: I always -- I always have filed. You know, that's why I said it wasn't like consciously that I chose, okay, I file every year; this year I'm not going to file, you know, I'm not going to, you know, pay my taxes this year for no reason. No. It was -- that was the furthest thing from my mind. My bills were the furthest thing from my mind.

The underlined testimony of defendant RAQUEL FORERO, as set forth above, was false in that defendant RAQUEL FORERO had not filed her Federal Tax Returns, or paid her Federal

Taxes, for tax years 1997-1999 and had not paid her entire Federal Tax Liability for tax year 1999 when she made these declarations.

All in violation of Title 18, United States Code, Section 1001.

COUNT THREE: (Title 18, United States Code, Section 1001 - Making False Statements to Federal Agency)

The Grand Jury further charges:

On or about February 25, 2003, in the District of Massachusetts,

RAQUEL FORERO

the defendant herein, in a matter within the jurisdiction of the Executive Branch of the Government of the United States, did knowingly and willfully make materially false statements and representations, to wit: during a meeting with Special Agents of the Internal Revenue Service, Criminal Investigation, she represented that (1) she had always filed tax returns for all tax years, other than the 1999 tax year and (2) it was only the 1999 year tax return that she failed to file. Defendant RAQUEL FORERO knew that these statements and representations were false at the time she made them.

All in violation of Title 18, United States Code, Section 1001.

A TRUE BILL

Donald J. Shanahan

FOREPERSON OF THE GRAND JURY

B. Stephanie Siegmann

B. STEPHANIE SIEGMANN
ASSISTANT U.S. ATTORNEY

DISTRICT OF MASSACHUSETTS; December 16, 2003 *12:31 PM*

Returned into the District Court by the Grand Jurors and filed.

Boz Brown

DEPUTY CLERK